

## REMARKS

This application has been reviewed in light of the Office Action dated April 27, 2007. Claims 1-29 are pending in the application. By the present amendment, Claims 1, 11, 12, and 22 have been amended. No new matter has been added. The Examiner's reconsideration of the rejection in view of the amendment and the following remarks is respectfully requested.

Independent Claims 11 and 22 stand rejected under 35 U.S.C. §101. Accordingly, Claim 11 has been amended to now recite “A computer-readable medium, tangibly embodying a program of instructions executable by a computer to perform method step for recognizing commands in natural language as recited in claim 1.” Moreover, Claim 22 has been amended to now recite “A computer-readable medium, tangibly embodying a program of instructions executable by a computer to perform method step for recognizing commands in natural language as recited in claim 12.” Thus, Claims 11 and 22 are believed to now satisfy 35 U.S.C. §101. Reconsideration of the rejection is respectfully requested.

Claims 1, 7-12, 18-23, and 27-29 stand rejected under 35 U.S.C. §102(b) as being anticipated by Ramaswamy, “A Pervasive Conversational Interface for Information Interaction, Eurospeech 1999 (hereinafter “Ramaswamy”). Claims 2-6, 13-17, and 24-26 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Ramaswamy in view of U.S. Patent No. 4,974,191 to Amirghodsi (hereinafter “Amirghodsi”).

As noted above, Claims 1 and 12 have been amended. Support for the amendments may be found at least at page 8, lines 10-17 of the Applicants' specification.

It is respectfully asserted that Ramaswamy does not teach or suggest “comparing an utterance to a plurality of handlers; identifying a winning handler for decoding a command from

the utterance, wherein the winning handler is identified by arbitration between results provided by at least two of the plurality of handlers”, as recited in Claim 1.

Moreover, it is respectfully asserted that Ramaswamy does not teach or suggest “providing a plurality of handlers trained to be responsive to given utterances; arbitrating against results provided by at least two of the plurality of handlers to determine a winning handler for an utterance”, as recited in Claim 12.

While Ramaswamy discloses a dialog manager having a mediator and being capable of spawning decision networks, the mediator in Ramaswamy is used to decide which decision networks to spawn and the appropriate device to which the response (of the spawned decision network) is to be presented. That is, the mediator in Ramaswamy determines which decision networks to spawn “based on the user’s command as specified by the formal language statement, and the input event source. After the decision network is determined, the Dialog Manager instantiates the [decision] network and causes it to execute within a separate thread, thereby permitting multiple transactions to be open at any given time” (Ramaswamy, Section 2.2).

It is to be noted that the Examiner as equated the decision networks disclosed in Ramaswamy to the handlers recited in Claims 1 and 12.

Thus, while Claims 1 and 12 essentially recite a plurality of handlers where arbitration is performed between results provided by at least two of the plurality of handlers to identify a winning handler, Ramaswamy simply discloses that his mediator determines which decision networks to spawn in the first place, i.e., before any results can be provided by such decision handlers. For example, as admitted by the Examiner at page 3 of the Office Action, “a mediator

(arbitration) chooses the correct decision network (handler) to spawn based on a user's command and the input event source". Thus, Ramaswamy cannot anticipate or render obvious Claims 1 and 12, since the mediator of Ramaswamy determines which decision networks to spawn (instantiate) IN THE FIRST PLACE and does not determine a winning handler based on results of at least two handlers as essentially recited in Claims 1 and 12, since such results could not have even been provided yet. That is, the mediator of Ramaswamy decides which decision network to spawn (instantiate), while Claims 1 and 12 essentially recite the use of arbitration to decide which handler, HAVING ALREADY BEEN APPLIED (LET ALONE INSTANTIATED), has the best result and selecting that handler as the winning handler.

Accordingly, Ramaswamy does not teach or suggest all of the above-recited limitations of independent Claims 1 and 12. Moreover, while not cited against Claims 1 and 12, it is nonetheless respectfully asserted that Amirghodsi does not cure the deficiencies of Ramaswamy, and is silent with respect to the above-recited limitations of Claims 1 and 12.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP §2131, citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

"To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art" (MPEP §2143.03, citing *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974)). "If an independent claim is nonobvious under 35 U.S.C. 103, then any claim depending therefrom is nonobvious" (MPEP §2143.03, citing *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988)).

Claims 2-11 depend from Claim 1 or a claim which itself is dependent from Claim 1 and, thus, includes all the elements of Claim 1. Claims 13-29 depend from Claim 12 or a claim which itself is dependent from Claim 12 and, thus, includes all the elements of Claim 12. Accordingly, Claims 2-11 and 13-29 are patentably distinct and non-obvious over the cited references for at least the reasons set forth above with respect to Claims 1 and 12, respectively.

Thus, reconsideration of the rejections under 35 U.S.C. §102 and 35 U.S.C. §103 is requested.

In view of the foregoing amendments and remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

It is believed that no additional fees or charges are currently due. However, in the event that any additional fees or charges are required at this time in connection with the application, they may be charged to applicant's IBM Deposit Account No. 50-0510.

Respectfully submitted,

Date: July 13, 2007

By: Gaspare J. Randazzo  
Gaspare J. Randazzo  
Registration No. 41,528

**Mailing Address:**

**KEUSEY, TUTUNJIAN & BITETTO, P.C.**  
**20 Crossways Park North, Suite 210**  
**Woodbury, NY 11797**  
**Tel: (516) 496-3868**  
**Fax: (516) 496-3869**